

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGIONS 5 77 WEST JACKSON BOULEVARD CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

June 12, 2006

BY FAX, REGULAR MAIL AND E-MAIL

Mr. Bruce White Karaganis, White & Magel, Ltd. 414 North Orleans Suite 810 Chicago, Illinois 60610

Re:

Ellsworth Industrial Park Site

Downers Grove, Illinois

Dear Mr. White:

EPA Region 5 Records Ctr.

I am writing to you in your role as Project Coordinator under the Administrative Settlement and Order issued for this Site in September, 2005 (OU 1 RI/FS Settlement). If you are not the current Project Coordinator, please forward this request to the appropriate person at your earliest possible convenience.

Under the OU1 RI/FS Settlement, the Settling Respondents agreed, among other things, to provide information in their possession related to the RI/FS Work when requested by the United States Environmental Protection Agency (U.S. EPA). As the U.S. EPA and its contractor prepare to begin the RI/FS field work, it is important to evaluate all available information concerning the physical features and operational history of the properties to be investigated.

U.S. EPA also understands that the Settling Respondents have been compiling and developing available information of this type concerning their properties for the discovery process in pending litigation. U.S. EPA therefore requests pursuant to Section VI.3 of the OU1 RI/FS Settlement that each Settling Respondent provide copies of the following documents with respect all of said Settling Respondent's properties at which RI/FS sampling is planned: (1) any deposition testimony and/or interrogatory answers describing the nature of past or present operations at the property and the location of the various elements of such operations; (2) copies of the exhibits referenced in such deposition testimony and/or interrogatory answers; (3) all maps, figures and drawings – current and historical – depicting the facility and/or depicting the nature or location of any buildings, equipment (above-ground or underground), utilities, sewer lines and any other non-natural features at the facility; and (4) copies of all data and analysis for any

sampling conducted after September, 2005. To the extent any of the requested documentation has already been provided to U.S. EPA, it need not be provided again as long as such documents are clearly identified in response to this request.

U.S. EPA requests that each Settling Respondent provide the requested documents to Mr. Mazin Enwiya, Remedial Project Manager, by no later than June 23, 2006. Thank you for your cooperation.

Sincerely yours,

Thomas J. Krueger

Associate Regional Counsel

cc: Mazin Enwiya, U.S. EPA